

Sotherson County

Circuit

Court

Box

Case File - Civil

November 1867, #98

Williams, Joseph J., Next Friend

Hensley, Cynthia A.

vs

Hensley, Leander

Divorce

Vagrancy; adultery with a Mrs. Landers;
children Austin, Wootson, Allen, Franklin,
Emma J., Lydia, Hulda

20

Folio

27

Cynthia A. Hensley by } In the Circuit
Joseph J. Williams her } Court of
next Friend, Plff. } Jefferson
County
vs } Missouri
Leander Hensley, Deft }

Plaintiff by her next friend Joseph J. Williams States that on the day of 1864 in the County of Jefferson in the State of Missouri she was lawfully married to the Defendant that Plaintiff continued to live with Defendant as his wife from and after the day and year aforesaid until the day of 1867 that during all that time Plaintiff faithfully demeaned herself and performed all her duties as the wife of Defendant and at all times treated him with kindness and affection but that the Defendant wholly disregarding his duties as the husband of Plaintiff, did on the day last aforesaid and on divers other days before that time that is to say almost habitually offer such indignities to the Plaintiff as rendered her condition intolerable in this Defendant, habitually scolded and abused Plaintiff that he on divers times attempted to drive Plaintiff away from his home and did on the day last aforesaid order and drive the Plaintiff away from his said home; that he drove Plaintiff away from said place for the purpose of bring another woman the wife of one Sanders who was

and still is in prison for a felony, to his said home to live with him, Plaintiff says that Defendant had arranged with said Woman to come & live with him before he drove Plaintiff away from home and drove & forced her to leave home for that purpose and that Defendant is now living with said Woman. Plaintiff states further that said Defendant has for many years failed to provide for her and the children of Plaintiff & Defendant but has for many years been guilty of such conduct as to render him a vagrant within the meaning of the Law respecting Vagrants. Plaintiff further states that there were borne of the marriage aforesaid seven children four Boys Austin now about twenty years old Wootson aged eleven, Allen aged six Franklin J. aged two & three daughters, Emma J. aged eighteen Lydia aged thirteen and Hilda aged nine

and Plaintiff further says that she has resided in this State one whole year next before the filing of this Petition. Plaintiff further states that Defendant is seized and possessed of Real and personal Estate and money, of the value of two thousand Dollars and that she is wholly without the means of support or for the prosecution of this suit and that since the day that the Defendant drove her away from home as above stated he has wholly failed to furnish any support for her or the children aforesaid and that she has been compelled to support herself & said children

by her own exertions & labor, plaintiff prays
to be divorced from the Bonds of matrimony Con-
tracted as aforesaid with the Defendant that she
may have the Custody & care of her said infant children
and that the Court will adjudge her such support &
maintenance maintenance out of the property of
said Defendant & for such time as the nature of the
case & the circumstances of the parties may require
& if necessary, compel the Defendant to give security
for such maintenance, & to make such further
orders from time to time touching the same as may
be just and such other orders and judgments touching
the premises as may be proper.

Joseph Williams
Atty. for plaintiff

Joseph J. Williams Attorney for the plaintiff
makes oath & says that the facts stated in
the above petition are true according to the
best knowledge & belief and that the complaint
is not made out of Levity or by Collusion
fear or restraint between the plaintiff &
Defendant for the mere purpose of being
separated from each other but in
sincerity and in truth for the causes
mentioned in the petition

Sworne to and
Subscribed before me
September 23rd 1867

Elias J. Hume, Clerk Cir. Ct.

By C. D. Hume Deput.

Joseph Williams

Lyons thia A. Mousley
by her next friends

as

Seander Mousley

action for divorce

Dated Sept 23rd 1867

D. J. Downey Clerk
by C. J. Downey Deft

Test before me

William

for Plaintiff

THE STATE OF MISSOURI, }
COUNTY OF JEFFERSON. } SS.

THE STATE OF MISSOURI,

To the Sheriff of the County of Jefferson—Greeting:

We command you, that you summon *Sander Hensley*

if he be found in your County, that
he be and appear before the Hon. Judge of our Circuit Court, on the
first day of the next term thereof, to be begun and held at the town of Hillsboro,
within and for the County of Jefferson, on the ~~First~~ Monday after the
~~fourth Monday~~ of November next, then and there to answer unto
Cynthia Hensley by her
next friend *J. F. Williams*

upon *her* original petition, a copy whereof is hereunto annexed and
accompanies this writ, and have you then there this writ.

Witness, ELIAS F. HONEY, Clerk of our said Circuit Court,
with the seal thereof hereunto affixed, at office in Hillsboro, this
Twenty third day of *September* A.D. 1867

Elias F. Honey
Clerk Circuit Court.
By C. D. Marine Dep't

Vol 985

TO

JEFFERSON CIRCUIT COURT.

November Term, 1867

Agatha Hensley

vs

Lander Hensley

Original

John Williams

Sheriff fee

\$1.00

I Executed this Writ in Jefferson County Mo on
the 3rd Day of October 1867 By Delivering to
Lander Hensley a true copy of this Writ and
Petition as furnished by the Clerk

John Williams Sheriff